UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (BOSTON)

In Re: BIOGEN IDEC, INC., SECURITIES

: 1:05-cv-10400 (RCL)

LITIGATION

:

MOTION TO SUBMIT JOINT DECLARATION OF THE BIOGEN INVESTOR LEAD PLAINTIFF GROUP MEMBERS IN FURTHER SUPPORT OF THE MOTION OF THEIR LEAD PLAINTIFF GROUP FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD PLAINTIFF'S CHOICE OF COUNSEL

The Biogen Institutional Investor Group moves this Court for leave to submit the attached Joint Declaration of The Biogen Investor Lead Plaintiff Group Members In Further Support Of The Motion of Their Lead Plaintiff Group For Appointment As Lead Plaintiff and Approval of Selection of Lead Plaintiff's Choice of Counsel ("Joint Declaration"). As grounds for this motion, the Biogen Institutional Investor Group states that at the hearing before this Court on July 21, 2005, its counsel informed the Court of its intention to submit the Joint Declaration because of its relevance to the Court's consideration of the competing motions for appointment of lead plaintiff and approval of selection of Lead Plaintiff's choice of counsel.

Dated: September 7, 2005 Respectfully submitted:

MOULTON & GANS, P.C.

By: /s/ Nancy Freeman Gans
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ENTWISTLE & CAPPUCCI LLP

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Counsel for the Biogen Institutional Investor Group

LOCAL RULE 7.1 CERTIFICATE

I, Nancy Freeman Gans, hereby certify that on September 7, 2005, I consulted with Matthew J. Matule, Esquire, of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for all Defendants, concerning the within Motion. Defendants do not oppose this Motion. I also consulted with Theodore M. Hess-Mahan, Esquire of Shapiro Haber & Urmy LLP, counsel for The London Pensions Fund Authority and National Elevator Industry Pension Fund, who oppose this motion.

/s/ Nancy Freeman Gans Nancy Freeman Gans

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party.

/s/ Nancy Freeman Gans Nancy Freeman Gans

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (BOSTON)

CHARLES BROWN, Individually and On Behalf of : 1:05-cv-10400 (RCL) All Others Similarly Situated,

Plaintiff.

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER, and JAMES MULLEN.

Defendants.

CARY GRILL, Individually and On Behalf of All Others Similarly Situated,

1:05-cv-10453 (RCL)

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and JAMES MULLEN,

Defendants.

ROCHELLE LOBEL, Individually and On Behalf of All Others Similarly Situated,

1:05-cv-10801 (RCL)

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and JAMES MULLEN,

Defendants.

JOINT DECLARATION OF THE BIOGEN INSTITUTIONAL INVESTOR LEAD PLAINTIFF GROUP MEMBERS IN FURTHER SUPPORT OF THE MOTION OF THEIR LEAD PLAINTIFF GROUP FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD PLAINTIFF'S CHOICE OF COUNSEL

- 1. I, George Laufenberg, am the Fund Administrator of the New Jersey Carpenters Annuity & Pension Funds. The Fund incurred losses of \$279,715.26 in connection with ITS transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 2. I, Bernt Magnusson, am the Compliance Officer of Folksam Asset Management ("Folksam"). Folksam incurred losses of \$857,697.61 in connection with Folksam's transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 3. I, Noel Smith, am a Partner of Third Millennium Trading, LLP. Third Millennium incurred losses of \$3,068,480.56 in connection with Third Millennium's transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 4. I, Charles W. Johnston, am General Counsel to Plumbers & Pipefitters Local 520 Pension Fund. The Fund incurred losses of \$111,467.73 in connection with the Fund's transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 5. I, Jim Graham, am the Chairman of the Deerfield Beach Nonuniformed Municipal Employees Retirement Plan ("Deerfield Beach"). Deerfield Beach incurred losses of \$130,680.96 in connection with its transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 6. I, Sam Sallerson, am a Partner of Horatio Capital, LLC ("Horatio Capital"). Horatio Capital incurred losses of \$516,068.63 in connection with its transactions in Biogen securities during the period February 18, 2004 to February 25, 2005.
- 7. Each of us is familiar with the competing motions made seeking appointment as lead plaintiff in the actions. We understand that, on account of our extensive losses in Biogen, the Biogen Institutional Investor Group has the largest financial stake in this action.

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- 8. We each have knowledge of the requirements and responsibilities of a lead plaintiff in a securities class action governed by the Private Securities Litigation Reform Act (the "PSLRA"). We understand that it is the responsibility of each member of the Biogen Institutional Investor Group to keep fully informed at all times concerning the status and progress of this action, the strengths and weaknesses of the case, and the prospects for any resolution of this matter, and to meet at least quarterly amongst ourselves and with Lead Counsel for status updates. As Lead Plaintiff, each member of the Biogen Institutional Investor Group will consult with each other, and with our respective counsel, in advance of each major litigation event, such as important motions, settlement discussions, trial preparation and trial, and shall have the authority and responsibility to direct counsel with respect to each of these events after receiving the benefits of Lead Counsel's advice.
- 9. We will communicate as often as is necessary to ensure the vigorous and efficient prosecution of this case. Further, we understand that Lead Counsel owe a fiduciary duty to all members of the proposed Class to provide fair and adequate representation.
- 10. We agreed to the filing of a motion on our behalf as members of the Biogen Institutional Investor Group before its filing. We decided to move together because, as shareholders with similar losses, we believed that we should each be afforded the opportunity to participate in this action and because the diversity of our group fairly reflects the Class we seek to represent. We also believe that we could function cohesively as a group.
- 11. We believe that the Biogen Institutional Investor Group counsel should be approved by the Court to serve as Lead Counsel for the Class. We have selected Milberg Weiss

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(www.milbergweiss.com) and Entwistle & Cappucci as Co-Lead Counsel because we believe that they possess extensive experience in prosecuting complex securities class actions and have achieved outstanding results on behalf of defrauded invostors. We believe that the firms' proven track records demonstrate that Milberg Weiss and Entwistle & Cappucci will work to obtain the best possible recovery for the Class.

12. In sum, as Lead Plaintiff in this action, we will work diligently to maximize the recovery for the Class.

We declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this day of July, 2005.

George Laufenberg

New Jersey Carpenters Annuity and Pension Funds

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Filed 09/07/2005

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Executed this 20 day of July, 2005.

Bernt Magnusson

Folksam Asset Management

Executed this Zaday of September, 2005.

Ndel Smith Third Millennium Trading, LLP

Executed this 24 day of July, 2005.

Charles W. Johnston

Plumbers & Pipefitters Local 520 Pension Plan

Executed this $\frac{19}{2}$ day of July, 2005.

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Horatio Capital, LLC